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AO 91 (Rev. 11/11) Criminal Complaint

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## UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Jeffrey Piecka

Case No. 1:21-mj-30213

Judge: Morris, Patricia T.

Filed: 05-06-2021

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 2012 - June 2020 in the county of Tuscola and elsewhere in the  
 Eastern District of Michigan \_\_\_\_\_, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 641	Theft of Government Funds
18 U.S.C. § 1343	Wire Fraud
18 U.S.C. § 1028A	Aggravated Identity Theft

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence  
 and/or by reliable electronic means.

Date: May 6, 2021City and state: ~~Detroit, MI~~ Bay City, MI


Complainant's signature

Sandra Reynolds, Special Agent - SSA-OIG/OI  
 Printed name and title



Judge's signature

Patricia T. Morris, U.S. Magistrate Judge  
 Printed name and title

**AFFIDAVIT IN SUPPORT OF  
CRIMINAL COMPLAINT AND ARREST WARRANT**

I, **SANDRA REYNOLDS**, being first duly sworn, hereby depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

- 1) I am a Special Agent with the Social Security Administration, Office of Inspector General, Office of Investigations (SSA/OIG/OI), assigned to the Chicago Field Division, Detroit Sub-Office and have been so employed since March of 2020. During this time, I have conducted investigations of fraud, waste, and abuse of benefit programs administered by the SSA. Prior to joining the SSA/OIG/OI, I was an investigator with the U.S. Department of Labor (USDOL) Employee Benefits Security Administration (EBSA) from July 2014 through January 2016 and an Associate Director of Investigations with Novartis Corporation from October 2008 through July 2014. In these previous roles, I conducted investigations of fraud, waste, and abuse committed by fiduciaries related to employee benefits plans; I also conducted investigations of theft, employee misconduct, and policy/regulatory violations. I hold a Bachelor of Science in Criminology from Florida State University, and a Master of Business Administration from Lynn University. I am a graduate of the United States Army Criminal Investigation Division Special Agent Course. In connection with my official duties as a Special Agent, I investigate violations of federal

law, including but not limited to Title 18 U.S.C. § 641 (Theft of Government Funds) and 42 U.S.C. § 408 (Social Security Fraud). I am authorized to execute warrants and make arrests.

- 2) I have been assigned to an investigation concerning the alleged theft of SSA funds by JEFFREY PIECKA, in violation of Title 18 U.S.C. § 641 (Theft of Government Funds), 18 U.S.C. § 1343 (Wire Fraud), and 18 U.S.C. § 1028A (Aggravated Identity Theft). I have prepared this affidavit in support of a criminal complaint and arrest warrant for PIECKA.
- 3) I have set forth the facts necessary to establish probable cause to believe that PIECKA did knowingly violate Title 18 U.S.C. § 641 (Theft of Government Funds), 18 U.S.C. § 1343 (Wire Fraud), and 18 U.S.C. § 1028A (Aggravated Identity Theft). Due to the limited purpose of this affidavit, I have not set forth all the facts known to me, but only those facts necessary to establish probable cause.

#### **PROBABLE CAUSE**

- 4) In or about July 2020, the SSA/OIG/OI received an allegation from an SSA employee concerning SSA beneficiary William Sneddon. The Flint, Michigan SSA office attempted to contact Sneddon because he had not used

his Medicare in at least three years. Sneddon did not respond to the letters that the SSA sent to him.

- 5) During the course of my investigation, I was able to determine that Sneddon died on February 16, 2007, in Fife, Scotland. A copy of Sneddon's death certificate was obtained from the Scottish Registry via the U.S. Department of State.
- 6) Sneddon was in current pay for SSA Title II, Retirement Insurance Benefits (RIB). The benefits were paid, via direct deposit, to checking account number 720802537 at JPMorgan Chase Bank, since 2006. Sneddon's address on his SSA record was 1743 Dent Hertog Street SW, Grand Rapids, MI. A total of \$176,682.00 in RIB benefits was deposited to Sneddon's bank account after his death.
- 7) Pursuant to an SSA/OIG/OI Inspector General subpoena, I obtained copies of transaction records from JPMorgan Chase Bank pertaining to Sneddon's account. Sneddon was the sole account holder. The primary money deposited into Sneddon's account after his death was his SSA benefits and a stimulus payment from IRS Treasury. Sneddon's address on the account was 1813 Wyoming Ave, Flint, MI. A review of Sneddon's bank records showed online transactions to "Jeff PIECKA" after Sneddon's death.

- 8) Using the Michigan Secretary of State (SOS) website, it was determined that PIECKA has a current Michigan driver's license issued on June 26, 2018, which lists 1753 N. Graf Road, Apt. A, Caro, MI 48723-8705 as his residence.
- 9) Through further investigation, I was able to determine that PIECKA was previously employed at JPMorgan Chase Bank. I then obtained copies of transaction records from JPMorgan Chase Bank pertaining to PIECKA's bank accounts, as well as a report regarding an internal investigation into PIECKA, which was conducted by JPMorgan Chase Global Security (GS). The GS report stated that PIECKA was employed as a Branch Manager at the JPMorgan Chase Davison Donegal Branch from January 7, 2008 through January 5, 2013. The GS report also stated that PIECKA was terminated from his position with JPMorgan Chase for falsifying bank documents unrelated to Sneddon.
- 10) According to the GS report, on May 11, 2012, PIECKA made demographic changes to Sneddon's bank account by creating online account access. On May 12, 2012, PIECKA initiated a transfer of \$48,900.00 from Sneddon's account; GS was unable to identify the receiving account due to the age of the transaction. GS also provided a spreadsheet that displays activity from Sneddon's account to PIECKA. This spreadsheet shows that from May 12, 2012, through June 22, 2020, there were approximately 328 transactions

totaling \$162,107.17. All transactions listed on the spreadsheet were associated with an email address of jeffpiecka@gmail.com.

11) PIECKA's JPMorgan Chase Bank records showed that PIECKA was the sole account holder for checking account number 805322492.

12) Sneddon's JPMorgan Chase Bank statements dated May 22, 2013, through February 22, 2017, showed electronic withdrawals described as "online payments" to "Jeff PIECKA" on a monthly basis for varying amounts.

PIECKA's JPMorgan Chase Bank records for account ending in 2492 reflect transactions that correlate to the dates and amounts of the withdrawals from Sneddon's account. For example, in PIECKA's bank records, there were copies of checks, which had "Chase Online Bill Payment" on the top left corner of the check. The checks were written to the order of PIECKA. Also, written on the checks was, "Apply to Acct: William Sneddon, 1813 Wyoming Ave, Flint, MI 48506." When compared to PIECKA's Michigan SOS driver's license, the endorsing signature on the back side of the checks appears similar. Some examples of the transaction dates and amounts of the checks are:

- a) December 3, 2014; \$1,100.00;
- b) May 1, 2015; \$2,270.00;
- c) December 31, 2015; \$1,035.00;

- d) June 3, 2016; \$1,090.00;
- e) October 3, 2016; \$1,115.00; and
- f) February 3, 2017; \$945.00.

13) A search on the Michigan SOS website showed that PIECKA had a Michigan driver's license, issued in October 2016, with an address of 2105 Thornridge Dr., Grand Blanc, MI. During the course of the investigation, I confirmed that the 2105 Thornridge Drive address is a part of the Thornridge Apartments property. Sneddon's JPMorgan Chase Bank statements dated June 20, 2015 through April 21, 2016, showed payments to Thornridge Apartments.

Some examples of the payments are:

- a) On July 3, 2015, an Online Payment to Thornridge Apartments for \$50.00;
- b) On August 4, 2015, a Thornridge Web Payment of \$50.00;
- c) On December 4, 2015, a Thornridge Web Payment of \$100.00;
- d) On January 4, 2016, a Thornridge Web Payment of \$100.00;
- e) On February 4, 2016, a Thornridge Web Payment of \$100.00; and
- f) On April 4, 2016, a Thornridge Web Payment of \$100.00.

14) Sneddon's JPMorgan Chase Bank statements dated December 21, 2019 through June 19, 2020 showed electronic withdrawals of \$534.21 for "Capital

One Auto Carpay 006205153323871.” Records obtained from Capital One revealed that PIECKA’s Capital One Auto Finance account number is 6205153323871101. The amount of \$534.21 was withdrawn from Sneddon’s account on the following dates:

- a) January 6, 2020;
- b) February 4, 2020;
- c) March 4, 2020; and
- d) May 27, 2020.

### **CONCLUSION**

15) Accordingly, based upon my training, experience, and the facts set forth in this Affidavit, there is probable cause to believe that PIECKA violated Title 18 U.S.C. § 641 (Theft of Government Funds), 18 U.S.C. § 1343 (Wire Fraud), and 18 U.S.C. § 1028A (Aggravated Identity Theft) by knowingly and intentionally stealing the SSA benefits paid to Sneddon after his death.

I, SANDRA REYNOLDS, Special Agent with the Social Security Administration, Office of the Inspector General, Office of Investigations, being




duly sworn according to law, hereby affirm that the facts stated in the foregoing affidavit are true and accurate to the best of my knowledge, information and belief.

  
SANDRA REYNOLDS  
Special Agent, SSA/OIG/OI

Sworn to before me and signed in my presence  
and/or by reliable electronic means.

Date: May 6, 2021

  
Patricia T. Morris  
United States Magistrate Judge